



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

February 12, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Reed Larson, President  
National Right to Work Committee, Inc.  
8001 Braddock Road, Suite 500  
Springfield, VA 22151

RE: MUR 3774

Dear Mr. Larson:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached Subpoena to Produce Documents and Order to Submit Written Answers which requires the National Right to Work Committee, Inc. (the "NRWC") to provide certain information in connection with an investigation it is conducting. The Commission does not consider the NRWC to be a respondent in this matter, but rather a witness only.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this Subpoena and Order. However, you are required to submit the information within 30 days of your receipt of this Subpoena and Order. All answers to questions must be submitted under oath.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

*Dawn M. Odrowski*  
by *max*  
Dawn M. Odrowski  
Attorney

Enclosure  
Subpoena and Order

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

)  
) MUR 3774  
)

**SUBPOENA TO PRODUCE DOCUMENTS**  
**ORDER TO SUBMIT WRITTEN ANSWERS**


TO: Reed Larson, President  
National Right to Work Committee, Inc.  
8001 Braddock Road, Suite 500  
Springfield, VA 22151

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

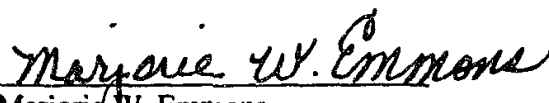
Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 30 days of receipt of this Order and Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his  
hand in Washington, D.C. on this 11th day of February 1997.

For the Commission,

  
John Warren McGarry  
Chairman

ATTEST:

  
Marjorie W. Emmons  
Secretary to the Commission

Attachments  
Interrogatories and Request for Documents

### INSTRUCTIONS

In answering the enclosed interrogatories and the request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1992 through the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

## **DEFINITIONS**

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named organization to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained. For all types of documentary records requested, if any of these records are maintained on any storage format for computerized information (e.g., hard drive, floppy disk, CD-ROM), provide copies of the records as maintained on that storage format in addition to hard (i.e., paper) copies.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses, the telephone numbers, the present occupation or position of such person, and the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and request for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

"Communication(s)" or "communicated" encompasses both oral and written communications, including phone calls, meetings, correspondence, notes or memos, and electronic mail messages.

## INTERROGATORIES

1. With respect to the attached checks from Coalitions for America payable to the National Right to Work Committee dated October 20, 1992 (Attachment 1) and November 12, 1992 (Attachment 2):

- a. Identify who received the check.
- b. Identify who deposited the check.
- c. State the purpose of the check.
- d. Identify all officers, directors, employees or other persons connected with the National Right to Work Committee in 1992 who had knowledge of the check.
- e. Describe how the check was used.

2. State whether the National Right to Work Committee made any contributions to federal candidates in 1992. If so, for each such contribution, list the candidate to whom the contribution was made, the date and amount of the contribution.

3. State whether the National Right to Work Committee engaged in, or financed, in whole or in part, any activities relating to federal elections in October-December 1992. Such activities include, but are not limited to: financing, producing or distributing voter guides or candidate questionnaires; financing, producing or distributing any communication containing the name(s) of any 1992 federal candidate(s); and financing or conducting get-out-the-vote phone calls, voter identification surveys or polls containing the name(s) of any 1992 federal candidates. If so, describe all such activities and for each activity, state the candidate(s) named in such activity, the date of the activity and the total cost of the activity.

4. State whether the National Right to Work Committee is an organization exempt from federal taxation under 26 U.S.C. § 501(c)(3) or (c)(4). If so, state which type of organization it is.

**PRODUCTION OF DOCUMENTS**

1. Produce all documents in any way relating to or referencing the checks attached as Attachments 1 and 2. The documents produced should include, but not be limited to, correspondence, notes, memoranda, calendars or other appointment books, phone and fax logs or phone messages.
2. Produce any and all contribution checks made to 1992 federal candidates as well as all documents in any way relating to or referencing such contribution checks. The documents produced should include checks (front and back), correspondence, notes, memoranda, phone and fax logs, faxes or phone messages.
3. Produce all documents in any way relating to or referencing the activities described in your response to Interrogatory Number 3. Such documents should include, but not be limited to, voter guides, candidate questionnaires, any communications containing the name(s) of federal candidate(s), telephone scripts used in conducting get-out-the vote calls, voter identification surveys or polling.
4. Produce all bank statements covering the period between October 1, 1992 and January 1, 1993 for the account into which the checks depicted in Attachments 1 and 2 were deposited and for any account(s) into which such funds were transferred.
5. Produce a complete copy of any and all Form 990 or Form 990 EZ tax returns filed by the National Right to Work Committee that cover the year 1992.